NOTICE OF MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT ON June 4, 2020, at 10:00 am, or as soon thereafter as counsel may be heard, before the Honorable Fernando M. Olguin, in Courtroom 6D of the above-captioned Court, located at 350 W. 1st Street, Los Angeles, CA 90012, Quicken Loans Inc. ("Quicken Loans") will and hereby does move this Court to permit Quicken Loans to submit rebuttal testimony, cross-examine, or strike certain portions of the declaration of Alexander Young.

This Motion is made pursuant to Federal Rules of Civil Procedure 26 and 37, and pursuant to the Court's inherent authority to permit the requested relief, on the ground that the April 7, 2020 declaration of Alexander Young (the "Young Declaration") submitted by Plaintiff Hill ("Hill") (ECF No. 94) contains improper testimony that was not previously disclosed in the January 17, 2020 Report prepared by Young pursuant to the Court's Orders (ECF Nos. 61, 69) and is inadmissible on other grounds. This Motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the pleadings and papers on file herein, and upon such other or further material as may be presented at or before the hearing on the Motion. The Motion seeks the relief requested in the accompanying Proposed Order.

This Motion is made following the conference of counsel pursuant to Local Rule 7-3, which took place on April 17, 2020.

Respectfully submitted,

Dated: April 27, 2020 By: /s/ W. Kyle Tayman

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